



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND  
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION

16/JAN/2018

MEMORANDUM

Subject:      Name of Pesticide Product:    Zecken Rollen Tick Tubes  
                 EPA Reg. No. /File Symbol:    71910-RN  
                 DP Barcode:                        D444442  
                 Decision No:                        534729  
                 Action Code:                        R300  
                 PC Code:                              109701 (permethrin)

From:          Eugenia McAndrew, Biologist  
                 Chemistry, Inerts and Toxicology Assessment Branch  
                 Registration Division (7505P)

Through:      P.V. Shah, Ph.D., Chief  
                 Chemistry, Inerts and Toxicology Assessment Branch  
                 Registration Division (7505P)

To:             Elizabeth Fertich, Risk Manager Team 04  
                 Invertebrate and Vertebrate Branch  
                 Registration Division (7505P)

Applicant:    Thermacell Repellents, Inc.  
                 c/o Scientific Coordination, Inc.  
                 4629 Cherry Valley Drive  
                 Rockville, Maryland 20853

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Permethrin	7.4
Other ingredients:	<u>92.6</u>
Total:	100.0

**ACTION REQUESTED:** Similarity determination for 71910-RN, proposed product, and 56783-1, cited product.

**BACKGROUND:** Thermacell Repellents, Inc. has applied for registration of Zecken Rollen Tick Tubes, EPA File Symbol 71910-RN, claiming to be substantially similar to Damminix, EPA Reg. No. 56783-1. The submission includes a Basic CSF and alternate #1 CSF dated October 5, 2017, label, data matrix and company letter.

The registrant is using the selective method of data support to satisfy the acute toxicity data requirements. The data matrix cites acute toxicity studies with MRIDs 447073-01 to -06. A search of the OPP databases shows that these studies were submitted to support the registration of LG Permethrin Technical, EPA Reg. No., 71532-1. They were reviewed and classified as acceptable in a 1999 Technical Review Branch/Registration Division memo (McAndrew; D290326; EPA Reg. No. 56783-1; 24/JULY/2003). The studies were conducted on 92% permethrin.

#### **RECOMMENDATIONS:**

1. We compared the basic CSFs and labels for the proposed product, 71910-RN, and the cited product, 56783-1, and determined that the two products are substantially similar.
2. The cited acute toxicity data with MRIDs 447073-01 to -06 were conducted on technical permethrin. They may be used to support this registration.
3. The acute toxicity profile for the proposed product, Zecken Rollen Tick Tubes, EPA File Symbol 71910-RN, based on the cited data is as follows:

acute oral toxicity	III	cited	MRID 44707301
acute dermal toxicity	III	cited	MRID 44707302
acute inhalation toxicity	IV	cited	MRID 44707303
primary eye irritation	III	cited	MRID 44707304
primary skin irritation	IV	cited	MRID 44707305
dermal sensitization	negative	cited	MRID 44707306

4. This product meets the requirements for Child Resistant Packaging based on the acute oral LD<sub>50</sub> in the cited study which is < 1500 mg/kg and residential application sites on product label. Unless this product meets any of the exemptions per 40 CFR 157.24, Child Resistant Packaging is required.

5. The proposed Basic CSF and Alternate #1 CSF submitted for 71910-RN must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

**LABELING:** Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

**PRODUCT ID #:** 71910-RN

**PRODUCT NAME:** Zecken Rollen Tick Tubes

**SIGNAL WORD:** CAUTION

#### **PRECAUTIONARY STATEMENTS**

##### **Hazards to Humans and Domestic Animals:**

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. [\*Wear protective eyewear.]

\*Protective eyewear may be specified, if appropriate. We note that the cited product label does not specify protective eyewear.

##### **First Aid:**

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water -Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.